

Robbins, Jan

From: Schommer, Ruth
Sent: Tuesday, February 25, 2003 5:53 AM
To: Robbins, Jan
Subject: FW: Contact Record for approval to store liquids in Modules A, B, D, and E of B707.

For 707 AR

Ruth Ann Schommer
X4067, Pager 212-4253
Projects 707 and 776/777
ESH&Q

-----Original Message-----

From: Hopkins, Ted
Sent: Monday, February 24, 2003 8:26 AM
To: 'James Hindman'; #Contact Records
Cc: Baker, Thomas; Cathel, Bob; Hicks, Carolyn; Lesser, Richard; Trice, Conrad; Arnold, Pam; Berardini, Jacqueline; Blush, Ed; Carman, Mac; Carranco, John; Caulfield, Richard; Christ, Joe; Crocker, Mark; Cronin, Robert; Dahlgren, Steven; Deck, Carol; DiSalvo, Richard; Dischinger, Joe; Emch, Daniel; Ferri, Mark; Flora, James; Garcia, Rick; Gilbreath, Chris; Gilmour, John; Gunderson, Steve; Hall, Patti; Hesel, Mark; Hindman, James; Holmes, Nancy; Hopkins, Ted; Joe Schieffelin; Johnson, Michael; Kellund, Gary; Kerridge, Jeffrey; Kilpatrick, Laura; Kray, Edd; Legare, Joe; MacLeod, Sandra; Mead, Jake; Nesta, Stephen; Newell, Nancy; Nishimoto, Gregg; North, Karan; Pizzuto, Victor; Rosenman, Andrew; Schommer, Ruth; Schuetz, Gary; Scott, Gregory; Shelton, Dave; Smiley, Cathy; Sproles, Wayne; Tim Rehder; Tim Rehder; Walker, Randy
Subject: Contact Record for approval to store liquids in Modules A, B, D, and E of B707.

On February 20, 2003 after consultation with Mr. James Hindman, CDPHE, I issued a Contact Record discussing Mr. Hindman's approval of our request to store liquid RCRA wastes in Modules A, B, D, and E of B707. After reviewing this Contact Record, Mr. Hindman requested that further information be added to the February 20, 2003 Contact Record to ensure that all requirements are clearly identified. These additions have been made and are being submitted as a clarification to the original Contact Record.

This Contact Record, dated 2/24/2003, contains all the requirements identified in the 2/20/2003 Contact Record as well as the additions Mr. Hindman identified. As such, the 2/24/2003 Contact Record supercedes the 2/20/2003 Contact Record and will be considered the sole regulatory compliance document for the requested activities.

Please contact me with any questions you might have in regard to this document.

thank you
Ted Hopkins



Module A liquids State
Clarifi...

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

CEX-105-01



ADMIN RECORD

B707-A-000088

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ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: February 24, 2003/ 7:00 a.m.

Site Contact(s): Ted A. Hopkins
Phone: 303-966-7652

Regulatory Contact: James Hindman
Phone: 303-692-3345

Agency: CDPHE

Purpose of Contact: Approval to store liquid RCRA wastes in Modules A, B, D, and E of Building 707.

Discussion

Rocky Flats Environmental Technology Site (RFETS) has submitted RCRA Permit Modification Request #01-01 to CDPHE for approval. Once approved this document would govern RCRA container storage operations and preparedness and prevention requirements for hazardous waste throughout the site. One example of the changes that this permit modification would allow is the storage of liquid RCRA wastes in Modules A, B, D, and E of B707. In anticipation of CDPHE's approval of the Permit Modification #02-01, B707 personnel have been planning to repack a number of legacy containers that contain liquids. Repack operations for legacy wastes in B707 are scheduled to start the week of February 24th. A repack enclosure is being constructed in Module A. However, CDPHE has not yet completed its review and approval of the permit modification.

In order to expedite the repack of these legacy wastes, Mr. James Hindman, CDPHE, has agreed to our request to allow for the interim storage of liquids in Modules A, B, D, and E of B707 in lieu of the Unit Specific Permit Conditions for Unit 707.1 provided:

- hazardous/mixed waste containers in these modules comply with all other applicable conditions of the existing RFETS RCRA Permit;
- hazardous/mixed waste containers in these modules holding free liquids must be provided with one of the types of secondary containment described in Section III.B.15 of the existing RFETS RCRA Permit;
- For containers in these modules of hazardous/mixed waste (that is not acutely hazardous per 6 CCR 1007-3) with capacities of 55-gallons or greater, "incidental liquid" is defined as amounts of liquid less than or equal to one (1) liter per container, resulting from condensation within the waste container or liquid which was entrained in the waste matrix when packaged, but has since separated from it; or liquid in an amount less than or equal to

one (1) liter per container which was not previously identified but discovered subsequently to packaging (e.g., by real time radiography).

Secondary containment may be provided for incidental liquids by any mechanism identified in Section III.B.15 of the existing RFETS RCRA Permit, or by a concrete floor that is free of cracks or gaps in the floor in the vicinity of container(s) holding incidental liquids. The area where containers with incidental liquids are to be stored must be inspected immediately prior to storage, and the inspection must be documented in the operating record. Containers of incidental liquids must be elevated (e.g., placed on pallets); and

- This approval would terminate once the new RFETS Permit is issued. RCRA operations after that date would have to comply with all requirements identified in the Permit.

Contact Record Prepared By: Ted A. Hopkins

Required Distribution:

P. Arnold, K-H 371
C. Deck, K-H
R. DiSalvo
C. Gilbreath, K-H 771
S. Gunderson, CDPHE
T. Hopkins, K-H 776
L. Kilpatrick, RFFO

J. Legare, DOE
R. Leitner, K-H 371
J. Mead, K-H ESS
S. Nesta, K-H RISS
K. North, K-H ESS/MS
B. Prymak, DOE
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D. Shelton, K-H

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